

# EXHIBIT “2”

CDJ

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

Abraham Ituah

16 5772

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

The City of Philadelphia  
Sheriff Department (Philadelphia)  
Synthia Stavrakis (city lawyer)  
Dimitrios Dimopoulos (Greek citizen)  
(foreign third party purchaser).

**COMPLAINT**

Jury Trial: ☒ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Street Address

County, City

State & Zip Code

Telephone Number

Abraham Ituah  
92 Robinson Avenue  
Newburgh  
NY 12550  
(310) 381-9859

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name The City of Philadelphia  
 Street Address 1401 JFK Boulevard, 5th floor  
 County, City Philadelphia PA 19102  
 State & Zip Code PA 19102

Defendant No. 2 Name Sheriff Department Jewell Williams  
 Street Address 100 S. Broad Street, 5th floor  
 County, City Philadelphia  
 State & Zip Code PA 19110

Defendant No. 3 Name Cynthia Stavrakis (city lawyer)  
 Street Address 1401 JFK Boulevard, 5th floor  
 County, City Philadelphia, Philadelphia  
 State & Zip Code PA 19102

Defendant No. 4 Name Dim. Trios Dimopoulos/Cool Spaces LLC  
 Street Address 105 Academy lane  
 County, City Broomall  
 State & Zip Code PA 19008

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)  
☐ Federal Questions ☒ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship New York

Defendant(s) state(s) of citizenship Pennsylvania and Foreign

### III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? At the City of Philadelphia lawyers and Sheriff Department

B. What date and approximate time did the events giving rise to your claim(s) occur? On Sept. 16 2015 my property was sold by the Sheriff department without notice. No service

C. Facts: My property located 3843 Fairmount Avenue, Philadelphia within the area of Brexel University and Penn University was sold without property notice from the City of Philadelphia and Sheriff Department to Dimitros Dimopoulos for \$34,500. Deposit of \$3,500 was paid when I filed petition on Sept. 21, 2015.

Cynthia Stavirakis organized the sale and responded to my petitions to set aside Sheriff Sale at 5:25 pm on the 30th day and also responded to my petition to Redefine.

The Sheriff Department failed to delivered notices regarding the Judgment, Sales of the property, transferred the Deed quickly from Dimitros Dimopoulos to Cool Space LLC without legally processing the transfer of Deed and making payment for the transfer as required by the City.

Court of Common Pleas records reflect that Complaint was filed on 4/22/2015, property was sold on 9/16/2015 (see Case No 1504T0504).

#### IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

I am currently in a serious financial and psychological pain to the extent that I now see a psychologist and filed Chapter 13-Bankruptcy with the U.S. Bankruptcy Court. All my hope depends of the property to settle the debt I owed to the City, Banks and other creditors.

#### V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I humbly request that this Honorable Court ask the City to return my property that worth \$150,000 at the time of sale and provide me with payment records reflecting all my payments to the City and award me compensation damages of \$100,000 for the treatment and psychological pain and financial problems I am presently suffering as a result the Defendants abuse of office and fraudulently connive to deceive the legal system or the Judge.



I declare under penalty of perjury that the foregoing is true and correct.

Signed this 7th day of November, 2015.

Signature of Plaintiff

Alm

Mailing Address

92 Robinson Ave  
Newburgh, NY 12550

Telephone Number

(310) 381-9859

Fax Number (if you have one)

E-mail Address

aoi23@drexel.edu

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: \_\_\_\_\_

Inmate Number \_\_\_\_\_

- Defendant 1. The City of Philadelphia  
1401 JFK Blvd, 5th floor  
Philadelphia PA 19102
- Defendant 2 Sheriff Department - Jewell Williams  
100 S. Broad Street, 1th floor  
Philadelphia PA 19100
- Defendant 3 Cynthia Stavrakis (City lawyer)  
1401 JFK Blvd, 5th floor  
Philadelphia PA 19102
- Defendant 4 Dimitros Amopolous  
105 Academy lane  
Broomall, PA 19008
- Defendant 5 Cool Spaces, LLC  
105 Academy lane  
Broomall, PA 19008

## UNITED STATES DISTRICT COURT

16-CV-5772

**CDJ**  
 FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 92 Robinson Ave, Newburgh NY 12550  
 Address of Defendant: 1401 JFK Blvd, 5th floor, 100 S Broad Street, 105 Academy Lane, Broomall, Philadelphia  
 Place of Accident, Incident or Transaction: Philadelphia  
 (Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?  
 (Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities? Yes ☒ No ☐

RELATED CASE, IF ANY:

Case Number: 1504T0504 Judge Linda Carpenter Date Terminated: February 11 2016

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
 Yes ☒ No ☐
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
 Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
 Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
 Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☐ All other Federal Question Cases  
 (Please specify) \_\_\_\_\_

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☒ All other Diversity Cases  
 (Please specify) Abuse of Office & Fraud

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Abraham Iturh, counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;  
☐ Relief other than monetary damages is sought.

DATE: 11/7/2016

AC  
 Attorney-at-Law

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 11/7/2016

AC  
 Attorney-at-Law

Pro Se Plaintiff



CDJ

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

v.

CIVIL ACTION

NO. 16-CV-5772

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) (X)
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( )

Date

(36) 381-9859

Telephone

Attorney-at-law

Pro Se Plaintiff

FAX Number

Attorney for

aoi23@drexel.edu

E-Mail Address